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January 16, 2019

**VIA ECF**

Magistrate Judge Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Janine Linton v. Frontier Airlines, Inc.**  
**Index No.: 18 CV 00044**  
**CF File: 16489/122476**

Dear Judge Tiscione:

We represent the Defendant in the referenced action and write on behalf of both parties to request an extension of time to complete discovery.

As discussed at the recent status conference, Plaintiff has retained new counsel who appeared in this action in December. Prior counsel for Plaintiff previously identified a plastic surgeon as an expert during discovery. Plaintiff's new counsel has advised our office that Plaintiff has now recently been examined by an additional medical expert. Plaintiff will also be using an expert in the field of aviation safety. These two experts are new and were not previously identified, therefore the parties request additional time to complete discovery.

The current discovery deadlines direct the parties to exchange expert reports by 1/18/19, complete expert depositions by 2/20/19, and all discovery is to be completed by 2/28/19. The parties are to begin dispositive motion practice by 3/28/19. The parties respectfully request that the aforementioned deadlines be changed to the following:

Plaintiff to serve expert disclosures on or before 1/31/19;

Defendant to serve expert disclosures on or before 3/5/19;

Expert depositions to be completed by 4/5/19;

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All discovery to be completed by 4/12/19; and

Parties to bring dispositive motion practice on or before 5/10/19.

The parties previously requested an extension of fact discovery which was granted. There have been two extensions previously granted for expert discovery, one made by Plaintiff's former counsel in mid-November and one by her current counsel upon appearing in this matter in mid-December.

Your Honor's attention to this matter is greatly appreciated.

Respectfully,



Michael Bojbasa

MB/dzc

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